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Atorneys for Plaintiff B.S.K through Guardian Ad Litem  
Ryan Wesley

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA-WESTERN DIVISION —**

## LOS ANGELES

B.S.K, a Minor, by and through her  
Guardian ad Litem, Ryan Wesley,

Case No.: 2:23-cv-09444-MCS-AS

**PLAINTIFF,**

VS.

**APPLICATION FOR  
APPOINTMENT OF GUARDIAN  
AD LITEM UNDER SEAL**

COUNTY OF LOS ANGELES,  
DEPARTMENT OF CHILDREN AND  
FAMILY SERVICES, AFSOUM  
ZARRAABIAN, NENITA BULANDUS,  
TAMEKA DAIRE, NICOLE LAVIN,  
CATHERINE VUKSANVIC, PRESTIGE  
OPPENHEIMER, DONNA BUCHLEY  
DOES 1-20, inclusive.

## **DEFENDANTS.**

**FATHER OF PLAINTIFF STATES THE FOLLOWS:**

1. I, Ryan Wesley, am the biological father of Minor Plaintiff, B.S.K.

- 1       2. Plaintiff, B.S.K was born February 2, 2018. Plaintiff, B.S.K was immediately  
2       removed from the care and custody of his biological mother, Kristal Koch and  
3       put in the custody of Department of Children and Family Services (DCFS). The  
4       removal resulted from the presence of drugs in her system and drug withdrawal  
5       symptoms observed with the Minor B.S.K.
- 6       3. The name of the minor Plaintiff in this action has been abbreviated to the initials  
7       of his first and last names in order to protect the privacy and identity of the  
8       minor Plaintiff. If any party to this action desires the full and complete names  
9       of the minor Plaintiff, said party should contact the attorney of record for that  
10      information.
- 11      4. The mother, Kristal Koch did not inform the petitioning party that she was  
12      pregnant with their child at any point during the pregnancy. Two months after  
13      the birth of B.S.K, Petitioning Party received a letter from DCFS informing him  
14      of his status as a potential father of B.K.S.
- 15      5. Petitioning Party immediately initiated custody proceedings for B.S.K. In 2020,  
16      Consequently, a juvenile dependency case found that Petitioning Party was the  
17      best caregiver for Plaintiff, B.S.K. In 2020, Petitioning Party was granted full  
18      physical and legal custody of B.S.K. Since being awarded full custody,  
19      Petitioning Party has provided for B.S.K.'s daily needs.
- 20      6. While in foster care B.S.K sustained permanent physical injury that caused  
21      disabilities to this day.
- 22      7. Petitioning Party request this court to appoint, Ryan Wesley, as Guardian ad  
23      Litem for the minor Plaintiff B.S.K.

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1 WHEREFORE, I move the Court for an order appointing RYAN WESLEY as  
2 Guardian Ad Litem for the minor Plaintiff B.S.K. for the purpose of bringing action  
3 against the aforementioned Defendants in the above action. My current address is  
4 31932 Cinnabar, Castaic, CA 91384.

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6 Dated: 02 / 05 / 2024



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Dated: February 5, 2024

/s/ Vincent W. Davis

Vincent W. Davis, Esq.  
Attorneys for Plaintiffs



Audit trail

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